

# SF-83 SUPPORTING STATEMENT ENVIRONMENTAL PROTECTION AGENCY

NSPS Small Municipal Waste Combustors (40 CFR part 60, subpart AAAA)

## **1. Identification of the Information Collection**

### **1(a) Title of the Information Collection**

NSPS: Small Municipal Waste Combustors (40 CFR part 60, subpart AAAA)

### **1(b) Short Characterization/Abstract**

The New Source Performance Standards (NSPS) for the regulations published at Small Municipal Waste Combustors (MWC) 65 FR76350 were proposed on August 30, 1999 and promulgated on December 6, 2000. These regulations apply to the following facilities in Small MWCs that combust greater than 35 tons per day (tpd) but less than 250 tpd of municipal solid waste: small MWCs commencing construction after August 30, 1999 and small MWC units that commenced reconstruction or modification after June 6, 2001. This information is being collected to assure compliance with 40 CFR part 60, subpart AAAA.

In general, all NSPS standards require initial notifications, performance tests, and periodic reports. Owners or operators are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, or any period during which the monitoring system is inoperative. These notifications, reports, and records are essential in determining compliance, and are required of all sources subject to NSPS. This ICR will enable EPA to monitor compliance with emission standards for regulated pollutants. Owners and operators of small MWCs are required to measure, record, and report emission rates and operating parameters, follow good combustion practices (GCP), and submit a siting analysis.

Any owner or operator subject to the provisions of this part shall maintain a file of these measurements, and retain the file for at least five years following the date of such measurements, maintenance reports, and records. All reports are sent to the delegated State or local authority. In the event that there is no such delegated authority, the reports are sent directly to the United States Environmental Protection Agency (EPA) Regional Office.

Approximately 6 MWC units at 3 plants are currently subject to the regulation, and it is estimated that an additional two MWC units at one plant per year will become subject to the regulation in the next three years. These estimates are based upon consultations with EPA national expert on MWCs, and Regional MWC coordinator, and review of websites from trade associations.

OMB approved the currently active ICR with "Terms of Clearance." It was recommended that before submitting a request for renewal, the Agency reassess the number of sources affected

by the the provisions of the NSPS for small municipal waste combustors. This was done using agency experience, expert advice, and new documentation. The EPA MWC expert in RTP was consulted and confirmed the estimate of the number of MWCs. He also provided the just-published directory of waste-to-energy units (MWCs) in the US. Although numbers of hours may appear large, some of the “forms” are in fact books composed of multiple measures, some conducted continuously over 3 days.

It was also recommended that the agency evaluate whether the burden-reducing provisions promulgated in this NSPS have resulted in reduced testing frequency for PM, dioxin/furans, HCl, cadmium, lead and mercury." The regulation (NSPS for Small MWCs Subpart AAAA) states that the reduction in reporting burden can occur in the fourth year of compliance after the facility has submitted annual reports for three consecutive years demonstrating that Class II small MWC unit has meet the the emission limit (see section 60.1305). Class II units (section 60.1045) are small MWCs located at MWC plants with aggregate plant capacity of less than or equal to 250 tons per day of municipal solid waste. Since the regulation was promulgated (December 6, 2000) less than three years ago, sufficient time has not elapsed for a facility to submit the required number (3) of annual reports/tests to qualify for the reduced reporting frequency which would occur in the fourth year.

## **2. Need for and Use of the Collection**

### **2(a) Need/Authority for the Collection**

The EPA is required under sections 111 and 129 of the CAA, as amended, to establish standards of performance for new stationary sources that reflect the maximum achievable control technology (MACT) for achieving continuous emission reductions:

Section 129(a)(1) states:

Standards applicable to solid waste incinerator units promulgated under section 111 and this section shall reflect the maximum degree of reduction in emissions of air pollutants listed under section (a)(4) that the Administrator, taking into consideration the cost of achieving such emission reduction, and any non-air quality health and environmental impacts and energy requirements, determines is achievable for new or existing units in each category.

Section 111(e) further states:

After the effective date of standards of performance promulgated under this section, it shall be unlawful for any owner or operator of any new source to operate such source in violation of any standards of performance applicable to such source.

In the Administrator's judgment, organics, metals, and acid gases emissions from small MWCs cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. MWC organics consist of doxins/furans. MWC metals are cadmium, lead,

mercury, and particulate matter. MWC acid gases consist of hydrogen chloride, sulfur dioxide, and nitrogen oxides. Therefore, the NSPS were promulgated for this source category at 40 CFR part 60, subpart AAAA.

### **2(b) Practical Utility/Users of the Data**

The control of emissions of organics, metals, and acid gases from small municipal waste combustors (MWCs) requires not only the installation of properly designed equipment, but also the operation and maintenance of that equipment. Emissions of organics, metals, and acid gases from small MWCs are the result of operation of the affected facilities. The subject standards are achieved by the capture and/or reduction of organics, metals, and acid gases emissions using good combustion practices and facility selected control technologies. The notifications required in the applicable regulations are used to inform the Agency or delegated authority when a source becomes subject to the requirements of the regulations. The reviewing authority may then inspect the source to check if the pollution control devices are properly installed and operated and the regulations are being met. Performance test reports are needed as these are the Agency's record of a source's initial capability to comply with the emission standards, and serve as a record of the operating conditions under which compliance was achieved. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations. The information generated by the monitoring, recordkeeping and reporting requirements described in this ICR is used by the Agency to ensure that facilities affected by the NSPS continue to operate the control equipment and achieve compliance with the regulation. Adequate monitoring, recordkeeping, and reporting is necessary to ensure compliance with the applicable regulations, as required by the Clean Air Act. The information collected from recordkeeping and reporting requirements is also used for targeting inspections, and is of sufficient quality to be used as evidence in court.

## **3. Nonduplication, Consultations, and Other Collection Criteria**

The requested recordkeeping and reporting are required under (40 CFR part 60, subpart AAAA).

### **3(a) Nonduplication**

If the subject standards have not been delegated, the information is sent directly to the appropriate EPA Regional Office. Otherwise, the information is sent directly to the delegated State or local agency. If a State or local agency has adopted their own similar standards to implement the Federal standards, a copy of the report submitted to the State or local agency can be sent to the Administrator in lieu of the report required by the Federal standards. Therefore, no duplication exists.

### **3(b) Public Notice Required Prior to ICR Submission to OMB**

An announcement of a public comment period for the renewal of this ICR was published in the Federal Register on June 20, 2002. No comments were received on the burden published in the Federal Register.

### **3(c) Consultations**

Consultations were held with national and regional experts in the field of MWC to discuss industry growth rate, the current number of facilities, and the number of new affected facilities over the next three years. The websites and publications of trade groups representing MWC were reviewed to determine number of facilities and growth in the industry.

### **3(d) Effects of Less Frequent Collection**

Less frequent information collection would decrease the margin of assurance that facilities are continuing to meet the standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and emission limitations are met. If the information required by these standards was collected less frequently, the likelihood of detecting poor operation and maintenance of control equipment and noncompliance would decrease.

### **3(e) General Guidelines**

None of these reporting or recordkeeping requirements violate any of the regulations established by OMB at 5 CFR 1320.5.

### **3(f) Confidentiality**

The required information has been determined not to be confidential. However, any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

### **3(g) Sensitive Questions**

None of the reporting or recordkeeping requirements contain sensitive questions.

## **4. The Respondents and the Information Requested**

#### 4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are small municipal waste combustors. The SIC code for the respondents affected by the standards is SIC (United States Standard Industrial Classification) X which corresponds to the NAICS (The North American Industry Classification System) X for small MWCs.

Regulation	SIC Codes	NAICS Codes
40 CFR part 60, subpart AAAA	9511 Air & Water Resource and Solid Waste Mgmt	92411 Air & Water Resource and Solid Waste Mgmt
40 CFR part 60 subpart AAAA	4953 Refuse System	562213 Solid Waste Combustors & Incinerators

#### 4(b) Information Requested

These standards require affected facilities to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to the standards. EPA believes that the five year records retention requirement is consistent with the Part 70 permit program and the five year statute of limitations on which the permit program is based. Also, the retention of records for five years would allow EPA to establish the compliance history of a source and any pattern of compliance for purposes of determining the appropriate level of enforcement action. Historically, EPA has found that the most flagrant violators frequently have violations extending beyond the five years. EPA would be prevented from pursuing the worst violators due to the destruction or nonexistence of records if records were retained for less than five years.

##### (i) Data Items

All data in this ICR that is recorded and/or reported is required by NSPS Small Municipal Waste Combustors (40 CFR part 60, subpart AAAA).

A source must make the following reports:

Reports for NSPS Small Municipal Waste Combustors (40 CFR part 60, subpart AAAA)	
Construction/reconstruction	60.7(a)(1), 60.1375

<b>Reports for NSPS Small Municipal Waste Combustors (40 CFR part 60, subpart AAAA)</b>	
Reports due before & after notice of construction	60.1375 60.1385
Actual startup	60.7(a)(3),
Initial stack tests for all regulated pollutants and parameters	60.8(a)&(d), 60.1395, 60.1400 60.1430
Notice of construction	60.1380
Semi-annual reports	60.1415 - 60.1420, 60.1430
Annual compliance reports for all pollutants and parameters.	60.1405, 60.1410, 60.1430
Reports for air curtain incinerators	60.1455
Demonstration of continuous monitoring system & test data	60.7(a)(5), 60.1395
Physical or operational change	60.7(a)(4)
Semiannual excess emission reports (SO <sub>2</sub> , CO, load, temperature, PM, dioxin/furan, opacity, HCl, Cd, Pb, Hg, fugitives).	60.1425
Report of CEMs demonstration and test data	60.1410

A source must maintain the following records:

<b>Recordkeeping for NSPS Small Municipal Waste Combustors (40 CFR part 60, subpart AAAA)</b>	
Records of occurrence & duration of any startups, shutdowns, malfunctions, periods or any malfunction of CEMS.	60.7(b), 60.1340, 60.1365
Records on material separation plan & siting analysis.	60.1345(a) 60.1350
Records of operator training and certification.	60.1340(b), 60.1355
Records of initial stack tests and annual stack tests.	60.1340(c), 60.1360

<b>Recordkeeping for NSPS Small Municipal Waste Combustors (40 CFR part 60, subpart AAAA)</b>	
Records for CEMS rates & parameters and computations of average emissions and parameters.	60.1340(d), 60.1365, 60.1370
Records of MWC units that use activated carbon. Records of quarterly amount of sorbent for Hg control.	60.1340(e), 60.1370
Records of results of daily CEMS drift tests & Appendix F accuracy assessments.	60.1365
Records are required to be retained for 5 years. The full 5 years of records must be retained at the facility.	60.1345

**(ii) Respondent Activities**

<b>Respondent Activities</b>
Read instructions.
Install, calibrate, maintain, and operate CEMS for opacity, SO <sub>2</sub> , NO <sub>x</sub> , O <sub>2</sub> )
Perform initial and annual performance tests, Reference Methods 1 & 23 for organics; Reference Methods 1 & 29 for Cd, Pb, Hg; Reference Method 9 for opacity; Reference Methods 1 & 5 for particulate matter; Reference Methods 1 & 26 or 26A for acid gases; & Reference Method 22 for fugitive ash. Repeat performance tests if necessary.
Conduct quarterly Appendix F audits of CEMS.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.

<b>Respondent Activities</b>
Adjust the existing ways to comply with any previously applicable instructions and requirements.
Train personnel to be able to respond to a collection of information. Ensure operators' training and certification.
Transmit, or otherwise disclose the information.

To demonstrate compliance with the standards for acid gases, metals, organics, and GCPs, owners or operators of small MWC units must collect the necessary information, keep records, and submit reports. Owners or operators must conduct initial compliance tests and compliance demonstrations for all pollutants, operating parameters, and continuous monitoring systems. Annual performance tests for PM, dioxins/furans, HCl, cadmium, lead, mercury, opacity, and fugitive ash emissions are required. Continuous monitoring of SO<sub>2</sub>, opacity, CO, load level, temperature of the flue gas stream, and oxygen (O<sub>2</sub>) or carbon dioxide (CO<sub>2</sub>) is required. For those small MWCs with NO<sub>x</sub> limits, continuous monitoring of NO<sub>x</sub> is required. As a means of determining continuous compliance for mercury and dioxins/furans, owners or operators are required to keep records of the amount of carbon used for activated carbon injection and to calculate the estimated hourly carbon injection rate for hours of operation.

Owners or operators of small MWC units must submit an initial compliance report for all regulated pollutants and parameters. Once a year, owners or operators must submit an annual report that indicates the highest emission level determined during the annual test or recorded using the CEMS for all regulated pollutants. The report must also include the lowest calculated hourly carbon feed rate.

If the emission level recorded for any of these pollutants is above the emission limit for the pollutant or if any operating parameter is outside a specified range, then the owner or operator is required to submit a semiannual report for the calendar half during which the test was conducted or data was collected. This semiannual report is required to include the supporting data or test report and an explanation for the exceedence. Owners or operators are not required to submit test reports or raw CEMS data unless a pollutant or parameter is recorded as exceeding the emission limit for the pollutant or parameter.

As mentioned above, the standards include a provision that would allow less frequent testing for PM, dioxins/furans, HCl, cadmium, lead, and mercury. If three annual compliance tests in a row indicate compliance with the PM, dioxin/furan, HCl, cadmium, lead, and mercury emission limits, then owners or operators of small MWC units (where the aggregate plant capacity is less than 250 tpd) may skip the annual performance test for that particular pollutant for the next two years. If the next test after skipping two years shows compliance, another 2-year period of tests may be skipped. At a minimum, performance tests for PM, dioxins/furans, HCl, cadmium, lead, and mercury are required by small MWC plants every 3 years. In all cases, annual tests for



opacity and fly ash/bottom ash fugitive emissions are required and may not be skipped. In addition, a provision for less frequent dioxin/furan testing allows plants to test only one unit per year rather than all units, as is normally required, if all units at the plant achieve emission levels significantly lower than the emission limit for two consecutive years. It is believed that most units will qualify for this option.

These two options for reduced testing frequency will reduce testing costs for PM, dioxins/furans, HCl, cadmium, lead, and mercury by approximately 67 percent over the three year period which starts in the fourth year after compliance. This burden estimate does not take credit for this potential for reduced burden for small MWC units.

As specified in subpart AAAA, owners or operators of small MWC units are required to keep records of certain parameters and information. Owners or operators are required to maintain records of employees' names and dates of their initial and annual review of the site-specific operating manual. Owners or operators are required to maintain records of emission rates using CEMS for SO<sub>2</sub>, CO, and O<sub>2</sub> or CO<sub>2</sub>, and NO<sub>x</sub> (if applicable), and continuous opacity monitors for opacity levels. Records of continuous measurements of MWC unit load and PM control device temperature, and computation of average emissions and operating parameters, are also required. Owners or operators are required to maintain records that identify the date, operating parameters, and opacity level exceedances, with reasons and a description of corrective action. Owners or operators are required to keep records of results of daily SO<sub>2</sub>, NO<sub>x</sub> (if applicable), and CO, CEMS drift tests and quarterly Appendix F accuracy assessments. Owners or operators are required to maintain records of initial performance tests and all annual performance retests for compliance with PM, dioxins/furans, HCl, cadmium, lead, and mercury limits. Owners or operators are required to maintain records of periodic testing for fugitive ash emissions. All records are required to be maintained at the source for a period of five years. Refer to section 3(e) for justification of this 5-year recordkeeping requirement.

As part of the siting requirements under the promulgated standards, owners or operators of small MWC units are required to submit the results of a siting analysis and materials separation plan, hold public meetings on the analysis and the plan, and submit a report summarizing public comments and responses.

All reports required under the regulations are to be submitted to the respondent's State or local agency, whichever has been delegated NSPS enforcement authority by EPA. The information will be used solely to determine that all sources subject to the NSPS are achieving the standards.

## **5. The Information Collected: Agency Activities, Collection Methodology, and Information Management**

### **5(a) Agency Activities**

Because the information collection requirements were developed as an incidental part of standards development, no costs can be attributed to the development of information collection requirements. Because reporting and recordkeeping requirements on the part of the respondents are required under sections 111 and 129 of the CAA, no additional operational costs would be incurred by the Federal Government. Publication and distribution of the information are part of the AIRS Facility subsystem, with the result that no Federal costs can be directly attributed to the ICR. Examination of records to be maintained by the respondents would occur incidentally as part of the periodic inspection of sources that is part of EPA's overall compliance and enforcement program and, therefore, could not be attributable to the ICR. The only costs that the Federal Government would incur are: user costs associated with the analysis of the reported information; on-site observation of the initial CEMS demonstrations and initial performance tests and retests; and the preparation of an annual report summarizing the compliance status of all the affected facilities. These are presented in tables 5-7.

Labor rates for the Federal employees are based on the estimated hourly rates of \$38.30 for technical personnel (GS-12, Step 1); \$51.62 for management personnel (GS-13, Step 5); and \$20.72 for clerical personnel (GS-6, Step 3). These values represent the inclusion of a 1.6 multiplier to account for overhead and fringe benefit costs.

EPA conducts the following activities in connection with the acquisition, analysis, storage, and distribution of the required information.

<b>Agency Activities</b>
Observe initial performance tests and repeat performance tests if necessary.
Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the AIRS (Aerometric Information Retrieval System) Facility Subsystem (AFS) database.

### **5(b) Collection Methodology and Management**

Following notification of startup, the reviewing authority might inspect the source to determine whether the pollution control devices are properly installed and operated. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is entered into AFS which is operated and maintained by EPA's Office of Air Quality Planning and Standards. AFS is EPA's database for the collection, maintenance, and retrieval of compliance and annual emission inventory data for over 100,000 industrial and government-owned facilities. EPA uses AFS for tracking air pollution compliance and enforcement by local and State regulatory agencies, EPA Regional Offices and EPA Headquarters. EPA and its delegated Authorities can edit, store, retrieve and analyze the data.

The records required by this regulation must be retained by the owner or operator for five years.

#### **5(c) Small Entity Flexibility**

The Agency considers a small business in the MWC industry to be one with annual gross revenue less than \$6 million, and a small government to be one that serves a population less than 50,000. Some of the small MWC units potentially affected by the NSPS may be owned by small businesses, non-profit organizations, or governments. The EPA does not expect the standards to adversely affect these small entities. The standards only apply to units with capacities between 35 tpd and 250 tpd. Most small governments that own and operate MWC units have such small populations (less than 50,000 people) that they own and operate MWC units smaller than 35 tpd capacity. Furthermore, the standards contain provisions for reduced testing. Owners of some small MWC units can skip annual tests for 2-year periods for certain pollutants if they have demonstrated compliance for three annual tests in a row. In addition to this reduced testing option, less frequent dioxin/furan testing is possible if all MWC units at a plant achieve emission levels less than the emission limit for two consecutive years. This provision allows plants to test only one unit per year rather than all units, as normally required.

#### **5(d) Collection Schedule**

The specific frequency for each information collection activity within this request is shown in Table 2: Annual Federal Government Burden & Cost of Recordkeeping and Reporting Requirements of the NSPS for Small MWCs.

### **6. Estimating the Burden and Cost of the Collection**

Table 2 documents the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for the subpart included in this ICR. The individual burdens are expressed under standardized headings believed to be consistent with the concept of burden under the Paperwork Reduction Act. Where appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

The Agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB Control Number.

## **6(a) Estimating Respondent Burden**

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 25,201 hours ( Total Labor Hours from Table 2). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NSPS program, the previously approved ICR, and any comments received.

## **6(b) Estimating Respondent Costs**

### **(i) Estimating Labor Costs**

This ICR uses the following labor rates: \$85.81 per hour for Executive, Administrative, and Managerial labor; \$57.12 per hour for Technical labor, and \$36.27 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2002, "Table 10. Private industry, by occupational and industry group." The rates are from column 1, "Total compensation." The wage rates have been increased by 110% to account for the benefit packages available to those employed by private industry.

Managerial	\$85.81	(\$40.86 + 110%)
Technical	\$57.12	(\$27.20 + 110%)
Clerical	\$36.27	(\$17.27 + 110%)

### **(ii) Estimating Capital/Startup and Operation and Maintenance Costs**

The type of industry costs associated with the information collection activity in the regulations are for labor and continuous emission monitoring (CEM). The capital/startup costs are one time costs when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitor and other costs such as photocopying and postage.

Capital costs associated with this NSPS result from the installation of CEMS. All small MWC plants must install CEMS to collect the information required by EPA. CEMS are required for monitoring SO<sub>2</sub>, NO<sub>x</sub> (as applicable), opacity, CO, and CO<sub>2</sub> or O<sub>2</sub> in the MWC exhaust stream. Based on EPA's experience with CEMS installation, the estimated purchase cost of a CEMS for SO<sub>2</sub>, NO<sub>x</sub>, opacity, CO, CO<sub>2</sub> or O<sub>2</sub> is \$100,000.

Other start-up costs result from initial CEMS demonstrations and from initial performance tests for PM, dioxin/furans, opacity, fugitives, HCl, lead, mercury, and cadmium.

Given the requirements of the NSPS, the estimated total annualized capital and startup costs for the affected units averaged over the first 3 years are \$200,000.

Costs associated with O&M and purchase of service costs include purchase of reference

gases needed to perform daily calibration. Based on EPA's experience with CEMS calibration and gas costs, it is estimated that each MWC unit will spend \$9,600 per year or approximately \$26 per day on reference gases for the CEMS.

The estimated total operation, maintenance, and purchase of services costs averaged over the three years are expected to be \$76,800. In the fifth, sixth, and seventh year after promulgation of this NSPS, or Years 1, 2 and 3 of this ICR, the O&M costs are \$57,600, \$76,800 and \$96,000, respectively.

**(iii) Capital/Startup vs. Operation and Maintenance (O&M) Costs**

<b>Capital/Startup vs. Operation and Maintenance (O&amp;M) Costs</b>						
(A) Continuous Monitoring Device	(B) Startup Cost (\$) for One Affected Facility	(C) Number of New Affected Facilities to Startup	(D) Total Startup  (B X C)	(E) Annual O&M Costs (\$) for One Affected Facility	(F) Number of Affected Facilities with O&M	(G)Total O&M  (E X F)
60.1315 - 60.1335	200000	1	200000	19200	4	76800

The total capital/startup costs for this ICR are \$200,000. This is the total of column D in the above table. These costs are shown in block 14(a), Total annualized capital/startup costs, on the OMB 83-I form. It should be noted that the numbers in block 14 of the OMB 83-I form are rounded to show the cost in thousands of dollars.

The total operation and maintenance (O&M) costs for this ICR are \$76,800. This is the total of column G. These costs are shown in block 14(b), Total annual costs (O&M), on the OMB 83-I form.

The total respondent non-labor costs in block 14 have been calculated as the addition of the capital/startup costs, and the annual operation and maintenance costs. The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$276,800. This cost is shown on the OMB 83-I form in block 14 (c), Total annualized cost requested. The numbers in block 14 of the OMB 83-I form are rounded to show the cost in thousands of dollars.

**6(c) Estimating Agency Burden and Cost**

The only costs to the Agency are those costs associated with analysis of the reported information. Publication and distribution of the information are part of the AFS program. Examination of records to be maintained by the respondents will occur as part of the periodic

inspection of sources, which is part of EPA's overall compliance and enforcement program.

The average annual Agency cost during the three years of the ICR is estimated to be \$71,527 (See Table 2). This cost is based on the average hourly labor rate times a 1.6 benefits multiplication factor to account for government overhead expenses as follows:

Managerial	\$51.62	(GS-13, Step 5, \$32.26 x 1.6)
Technical	\$38.30	(GS-12, Step 1, \$23.94 x 1.6)
Clerical	\$20.72	(GS-6, Step 3, \$12.95 x 1.6)]

These rates are from the Office of Planning and Management (OPM) "2002 General Schedule" which excludes locality rates of pay. Details upon which this estimate is based appear in Table 1: Annual Federal Government Burden & Cost of Recordkeeping & Reporting Requirements of the NSPS for Small MWC Units Subject to subpart AAAA, below.

#### **6(d) Estimating the Respondent Universe and Total Burden and Costs**

<b>Respondent Universe and Number of Responses Per Year</b>						
Regulation Citation	(A) Average Number of New Respondents per Year	(B) Number of Reports for New Sources	(C) Number of Existing Respondents	(D) Number of Reports for Existing Sources	(F) Number of Respondents that keep records but do not submit reports	(E) Total Annual Responses = (AxB)+(CxD)+ F
60.1340 - 60.1430	1	4	3	2	0	10

The number of total respondents is six. This number is the sum of column A and column C of the Respondent Universe and Number of Responses Per Year table. This represents the number of existing sources plus the number of new sources averaged over the three-year period (i.e., number of new respondents per year multiplied by three years divided by two). It is shown in block 13 (a), Number of respondents, on the OMB 83-I form.

The number of Total Annual Responses is ten. This is the number in column E of the Respondent Universe and Number of Responses Per Year table. It is shown in block 13 (b), Total annual responses, on the OMB 83-I form.

The total annual labor costs are \$541,137. This number is not shown on the OMB 83-I form in block 13(c), Total hours requested. Only the burden hours are reflected in block 13(c).

Details upon which this estimate is based appear in Table 1. Annual Respondent Burden and Cost, NSPS Small Municipal Waste Combustors (40 CFR part 60, subpart AAAA).

The total annual capital and O&M costs to the regulated entity are \$276,800. This number is shown on the OMB 83-I form in block 14 (c), Total annualized cost requested. These costs are detailed in section 6(b)(iii), Capital/Startup vs. Operating and Maintenance (O&M) Costs.

#### **6(e) Bottom Line Burden Hours Burden Hours And Cost Tables**

The bottom line burden hours and cost tables for the Respondents are included near the end of this document as Table 1. Comparable information for the Agency is attached as an Excel File (table2).

#### **6(f) Reasons for Change in Burden**

The increase in burden from the most recently approved ICR is due to an adjustment. The adjustment increase in burden from the most recently approved ICR is due to an increase in the number of new or modified sources.

#### **6(g) Burden Statement**

**Burden Statement:** The annual public reporting and recordkeeping burden for this collection of information is estimated to average 2,100 hours per MWC unit. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR part 9 and 48 CFR chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID No. OECA-2002-0014 which is available for public viewing at the Enforcement and Compliance Docket Information Center (ECDIC), in the EPA Docket Center (EPA/DC), EPA West, Room B102, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding

legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the (ECDIC) Docket is (202) 566-1514. An electronic version of the public docket is available through EPA Dockets (EDOCKET) at <http://www.epa.gov/edocket>. Use EDOCKET to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. Once in the system, select "search," then key in the docket ID number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Office for EPA. Please include the EPA Docket ID No. (OECA-2002-0014) and OMB control number (2060-0423) in any correspondence.



TABLE 1. SUMMARY OF RESPONDENT BURDEN FOR THE PROPOSED NEW SOURCE PERFORMANCE STANDARDS  
FOR SMALL MWC UNITS - YEARS 1 THROUGH 3 AND AVERAGE

							Non-Labor Costs		
Year	Technical Hours	Management Hours	Clerical Hours	Contractor Hours	Total Hours	Labor Costs	Capital	O&M	Total Costs
Year 1	6,408	320	641	11,532	18901	417,081	200,000	57600	674681
Year 2	8,314	416	831	14,460	24021	541,137	200,000	76800	817937
Year 3	10,220	511	1,022	17,388	37802	665194	200,000	96000	961194
Totals	24942	1247	2494	43380	75604	1623412	600,000	230400	2453812
Average Burden					25201	541137	200,000	76800	806,474

Note: All figures are rounded.

**Part B of the Supporting Statement**

This part is not applicable because no statistical methods were used in collecting this information.